

From: [Saric, James](#)
To: [Jamie McCarthy](#); [Lebo, Martin](#); [Gay, Richard](#)
Subject: FW: Disapproval of Area 4 SRI/FS Work Plan
Date: Wednesday, February 27, 2013 11:16:00 AM
Attachments: [Area 4 RIFS Work Plan Disapproval.pdf](#)

FYI

From: Saric, James
Sent: Wednesday, February 27, 2013 11:12 AM
To: 'Griffith, Garry T.'; P. E. Michael Erickson (michael.erickson@arcadis-us.com)
Cc: 'BUCHOLTZP@michigan.gov'; Jeff.Keiser@CH2M.com; Carlson, Janet; Canar, John; Wood, Nicole
Subject: Disapproval of Area 4 SRI/FS Work Plan

Mike:

Enclosed is EPA's disapproval letter with comments on the Area 4 Supplemental Remedial Investigation/Feasibility Study Work Plan.

Thanks
Jim Saric
U.S. EPA Region V
(312) 886-0992



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

SR- 6J

February 27, 2013

Mr. Michael J. Erickson
Vice President
ARCADIS
10559 Citation Drive, Suite 100
Brighton, Michigan 48116

RE: Area 4: Former Trowbridge Impoundment Supplemental Remedial
Investigation/Feasibility Study Work Plan

Dear Mr. Erickson:

The U.S. Environmental Protection Agency (EPA) has completed its review of the Area 4 Supplemental Remedial Investigation/Feasibility Study (SRI/FS) Work Plan, submitted on November 30, 2012, for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site. This SRI/FS work plan describes the supplemental activities to be completed to augment the existing environmental data in Area 4 to complete the SRI/FS. EPA has several issues with the work plan that must be addressed, and has enclosed comments on the Area 4 SRI/FS work plan.

Therefore, EPA disapproves the Area 4 SRI/FS work plan pending receipt of adequate responses to the enclosed comments and a revised report. The responses to the enclosed comments and revised report must be submitted within (60) sixty days of receipt of this letter.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "James A. Saric".

James A. Saric
Remedial Project Manager
SFD Remedial Response Branch #1

Enclosure

**U.S.EPA COMMENTS
ON THE AREA 4
SUPPLEMENTAL REMEDIAL INVESTIGATION WORK PLAN
ALLIED PAPER, INC./PORTAGE CREEK/KALAMAZOO RIVER SITE**

GENERAL COMMENTS

**Commenting Organization: EPA
General Comment #: 1**

Commenter: White

The data quality objectives presented in Section 5 are broad and general. Given the lack of specificity, the sampling plans should include more detailed DQOs that explain how the study goals will be achieved.

**Commenting Organization: EPA
General Comment #: 2**

Commenter: White

In upstream areas, the river is divided into channel and floodplain areas for assessment. The Area 4 work plan should explain how the frequently inundated areas will be treated – how will the boundary between predominately aquatic and predominately terrestrial areas be determined?

**Commenting Organization: EPA
General Comment #: 3**

Commenter: Keiser/Saric

The work plan describes a reconnaissance survey to be conducted in 2013, however the work plan does not provide sufficient detail to proceed with the reconnaissance survey. The Area 4 work plan should be revised to include the details of a reconnaissance plan and survey. This will provide field and oversight staff with the information necessary to complete the work. Required items include a map of transects or probing locations, detailed methods to be used, decision matrices for additional probing and proposed locations for study boundary confirmation sampling.

**Commenting Organization: EPA
General Comment #: 4**

Commenter: Saric

Although the work plan is clear that a phase one field sampling plan will be submitted, it is inconsistent in its discussion of the phase two field sampling plan. Figure 8-1 clearly indicates a phase two field sampling plan may occur, depending upon the results of the phase one field sampling. Therefore, the work plan should be revised to clarify that a phase two field sampling event is anticipated, but may not be required if determined by EPA.

Commenting Organization: EPA
General Comment #: 5

Commenter: Saric

The work plan is not clear which, if any, changes may be made to both the human health and ecological risk assessments. The document needs to clarify what changes are anticipated and EPA recommends any new information and/or changes to the risk assessments be discussed early in the process before the RI report is submitted.

SPECIFIC COMMENTS

Commenting Organization: EPA
Section: 2 Page #: 2-1
Specific Comment #: 1

Commenter: White
Lines #: NA

The Area 4 boundary is estimated as the 669 foot NGVD contour. Has the 100-year floodplain elevation been established for Area 4? If not, will it be established as part of the SRI as part of the hydrodynamic modeling effort?

Commenting Organization: EPA
Section: 4 Page #: 4-3
Specific Comment #: 2

Commenter: White
Lines #: NA

Figure 4-1 – this figure shows water flowing uphill; anomalous water level measurements should be identified and either corrected or removed from the cross-section.

Commenting Organization: EPA
Section: 4 Page #: 4-6
Specific Comment #: 3

Commenter: White
Lines #: NA

It appears that more PCB sample results are shown on Figure 3-3 than in Figure 4-4 – for example, Figure 3-3 shows quite a few sample results between river miles 47.5 and 48.5 whereas Figure 4-4 only shows samples along two transects in this section. In the SRI report, the rationale should be provided for excluding any data sets from any of the graphics.

Commenting Organization: EPA
Section: 5 Page #: 5-1
Specific Comment #: 4

Commenter: White
Lines #: NA

One of the study goals is to “estimate PCB loading to the Kalamazoo River from bank erosion.” This study goal should be expanded to include a more comprehensive PCB fate and transport analysis that considers both particulate and dissolved-phase PCB transport mechanisms.

Commenting Organization: EPA
Section: 8 Page #: 8-1
Specific Comment #: 5

Commenter: Saric
Lines #: NA

Although EPA concurs with field reconnaissance occurring in 2013, phase one field sampling occurring in 2014 and phase two field sampling occurring in 2015, the draft Area 4 SRI report must be submitted to EPA by February 1, 2016. .

Commenting Organization: EPA
Section: Appendix D Figures Page #:
Specific Comment #: 6

Commenter: Keiser
Lines #: NA

Provide legends for the figures in Appendix D. Figures D-3 and D-4 have several symbols and color codes that are not identified.